

1 JAMES J. YUKEVICH (SBN 159896)
jyukevich@yukelaw.com
2 CRISTINA M. CIMINELLI (SBN 206201)
cciminelli@yukelaw.com
3 STEVEN S. VAHIDI (SBN 283951)
svahidi@yukelaw.com
4 NOUSHAN NOUREDDINI (SBN 278512)
nnoureddini@yukelaw.com
5 YUKEVICH | CAVANAUGH
355 S. Grand Avenue, 15th Floor
6 Los Angeles, California 90071-1560
Telephone: (213) 362-7777
7 Facsimile: (213) 362-7788
8 Attorneys for Defendant
BNSF RAILWAY COMPANY
9

10 **UNITED STATES DISTRICT COURT**

11 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

13 NEIL A. JENSEN,

14 Plaintiff,

15 vs.

16 BNSF RAILWAY COMPANY,

17 Defendant.

CASE NO. 3:13-cv-05955-HSG

**JOINT REQUEST TO USE ADDITIONAL
TECHNOLOGY AND ORDER**

Assigned to Hon. Haywood S. Gilliam, Jr.

Filed Date: December 26, 2013

Trial Date: October 26, 2015

20 TO THE HONORABLE COURT:

21 Pursuant to the Honorable Haywood S. Gilliam, Jr.'s Civil Pretrial and Trial Standing
22 Order, Defendant BNSF RAILWAY COMPANY and Plaintiff NEIL JENSEN respectfully
23 request an Order from the Court allowing the parties to bring technological equipment into the
24 courtroom to use during trial. Specifically, the parties request permission to bring an Elmo,
25 projector, and screen.

26 / / /

27 / / /

28 / / /

1 The parties attest that concurrence in the filing of the foregoing documents has been
2 obtained from each of the signatories below.

3
4 DATED: October 20, 2015

YUKEVICH | CAVANAUGH

5
6 By: */s/ Noushan Noureddini*

7 James J. Yukevich
8 Cristina M. Ciminelli
9 Steven S. Vahidi
10 Noushan Noureddini
11 Attorneys for Defendant BNSF RAILWAY
12 COMPANY

13 DATED: October 16, 2015

HILDEBRAND, McLEOD & NELSON, INC.

14 By: */s/ Paula Rasmussen*

15 Anthony S. Petru
16 Kristoffer S. Mayfield
17 Paula Rasmussen
18 Attorneys for Plaintiff
19 NEIL A. JENSEN

YUKEVICH | CAVANAUGH
355 S. Grand Avenue, 15th Floor
Los Angeles, California 90071-1560
Telephone (213) 362-7777
Facsimile (213) 362-7788

1 **[PROPOSED] ORDER**

2 IT IS ORDERED that the parties shall be allowed to bring an Elmo into the courtroom to
3 use during trial.

4

5 DATED: October 20, 2015

6 

7 Honorable Haywood S. Gilliam, Jr.
8 United States District Court Judge

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 355 South Grand Avenue, Fifteenth Floor, Los Angeles, CA 90071-1560.

On October 16, 2015, I served true copies of the following document(s) described as **JOINT REQUEST TO USE ADDITIONAL TECHNOLOGY AND [PROPOSED] ORDER** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY CM/ECF for parties that are CM/ECF participants. Service is being made electronically on those parties on the attached list that are registered users of the Court's Electronic Case Filing System.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on October 16, 2015, at Los Angeles, California.

/s/ *Herme A. Britton*
Herme A. Britton

YUKEVICH | CAVANAUGH
355 S. Grand Avenue, 15th Floor
Los Angeles, California 90071-1560

1 **SERVICE LIST**

2 **NEIL A. JENSEN v. BNSF RAILWAY COMPANY**
3 **U.S.D.C. - Northern Dist. Ct. Case No. 3:13-cv-05955-JD**

4 Anthony S. Petru, Esq. Attorneys for Plaintiff
5 Paula A. Rasmussen, Esq.
6 HILDEBRAND McLEOD & NELSON, LLP T: (510) 451-6732
7 350 Frank H. Ogawa Plaza F: (510) 564-7023
8 4th Floor petru@hmnlaw.com
9 Oakland, CA 94612 rasmussen@hmnlaw.com

10 Charles Goetsch Co-Counsel for Plaintiff
11 405 Orange Street
12 New Haven, CT 06511 charlie@gowhistleblower.com

13 YUKEVICH | CAVANAUGH
14 355 S. Grand Avenue, 15th Floor
15 Los Angeles, California 90071-1560
16 Telephone (213) 362-7777
17 Facsimile (213) 362-7788